

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

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JOHN J. VAUGHN, GERALD A.  
KALBFLEISCH, MICHAEL HATHAWAY :  
and MYRTLE HATHAWAY :  
:  
Plaintiffs, :  
:  
v. : Civil Action  
: No. 04-10988-GAO  
:  
PUTNAM INVESTMENT MANAGEMENT,  
LLC and PUTNAM RETAIL :  
MANAGEMENT LIMITED PARTNERSHIP :  
:  
Defendants.  
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**ASSENTED-TO MOTION FOR LEAVE TO FILE A REPLY  
MEMORANDUM IN SUPPORT OF MOTION FOR A PROTECTIVE ORDER AS  
TO THE DEPOSITION OF PUTNAM PRESIDENT AND CEO CHARLES HALDEMAN**

Pursuant to Local Rule 7.1(B)(3), Defendant Putnam Investment Management, LLC, and Defendant Putnam Retail Management Limited Partnership, and Charles Haldeman, respectfully move for leave to file a reply memorandum in further support of their Motion For A Protective Order As To The Deposition Of Putnam President And CEO Charles Haldeman (filed on March 27, 2007, Docket 122). Defendants and Mr. Haldeman submit that the reply memorandum contains analysis and authorities that will assist the Court in its consideration of the motion for protective order. The proposed reply memorandum is attached as Exhibit 1.

WHEREFORE, Defendants and Mr. Haldeman respectfully request that this Court grant leave to submit the reply memorandum in further support of their motion for a protective order.

**LOCAL RULE 7.1(A)(2) CERTIFICATION**

The undersigned counsel hereby certify that they have conferred with counsel for Plaintiffs who stated that they would assent to the requested relief, solely on the condition that undersigned counsel assent to Plaintiffs' motion for leave to file a surreply memorandum. Because undersigned counsel believe a reply is warranted and will be helpful to the Court, they accept Plaintiffs' condition, and file this as an assented-to motion.

Dated: May 3, 2007  
Boston, Massachusetts

Respectfully submitted,

/s/ James R. Carroll  
James R. Carroll (BBO #554426)  
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Putnam Investment Management,  
LLC and Putnam Retail Management  
Limited Partnership, and Charles Haldeman

**Certificate Of Service**

I, Scott T. Lashway, hereby certify that on May 3, 2007, this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on May 3, 2007.

Dated: May 3, 2007

/s/ Scott T. Lashway  
Scott T. Lashway